

PUBLIC UTILITIES COMMISSION

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June 3, 2013

Susan J. Nelson, AIA
Regulatory Affairs
Southern California Edison
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Final Engineering Concurrence to NTP #24

Dear Ms. Nelson,

On February 11, 2013, Southern Californian Edison (SCE) submitted a request for Final Engineering Concurrence (FEC) for additional work areas and access roads to facilitate wire stringing activities on the Segment 8 Transmission Line (T/L), Phase 4, of the Tehachapi Renewable Transmission Project (TRTP) in the City of La Habra Heights, Los Angeles County, California. SCE submitted additional information on March 29 and May 28, 2013. **This Concurrence to Final Engineering is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for Final Engineering Concurrence for additional work areas and access roads to facilitate wire stringing activities on Segment 8 T/L Phase 4 in the City of La Habra Heights, Los Angeles County, California. The Contractor, Wilson Construction, is requesting the field changes to facilitate wire stringing activities. This includes the addition of approximately 0.031 acres of turning area for large equipment and road improvements.

The variance request (VR) areas are described below:

- **VR6** is located next to WSS 8-4.22a, south of Structure M50-T1, and is approximately 0.011 acre. The requested area is needed to provide a sufficient turning area for wire stringing equipment to access WSS 8-4.22a and Structure M50-T1. Current conditions are inadequate to accommodate the oversized equipment. Disturbance activities include vegetation removal and trimming, installation of a Soldier Pile Wall, and backfilling the wall to create a wider road surface. VR6 is located in the City of La Habra Heights, County of Los Angeles.
- **VR8** is located adjacent to an approved access road, between Structures M51-T1 and M51-T2, and is approximately 0.019 acre. VR8 is needed to provide a sufficient turning area for wire stringing equipment for wire equipment access. Current conditions are inadequate to accommodate the oversized wire stringing equipment. Disturbance activities include placement and removal of a temporary Jersey Wall, backfilling the wall to create a wider road surface, vegetation removal, and re-contouring after the wall and fill are removed. VR8 is located in the City of La Habra Heights, County of Los Angeles.
- **Biological Resources:** SCE submitted a biological survey report from ICF International dated January 22, 2013, regarding the *Proposed Additional Work Areas and Access Roads, Segment 8 Phase 1 and 4, TRTP, Los Angeles County*. A revised report dated March 25, 2013 was also submitted. The report documents the biological conditions at the proposed Segment 8 work areas (Variance Project Component). The Variance

Project Component plus a 500-foot buffer is referred to as the Biological Study Area (BSA). Biological resources within the BSA were evaluated during several focused surveys, including 2009, 2010 and 2011 rare plant surveys (AMEC 2009o; ICF 2010at, 2011hc); 2010 and 2011 tree inventory surveys (ICF 2010av, 2011hd); 2010, 2011, and 2012 riparian bird focused surveys (ICF 2010ss, 2011fx; FRED Parent ID 000008) and 2012 riparian bird protocol surveys (FRED Survey Parent 000004); 2009, 2010, 2011, and 2012 coastal California gnatcatcher (*Polioptila californica*) focused surveys (AMEC 2008d, 2009m; ICF 2010ww, 2011gq; FRED Parent 000011); 2010 burrowing owl (*Athene cunicularia*) focused surveys (ICF 2010xx); 2009 and 2010 coast range newt (*Taricha torosa torosa*) focused surveys (AMEC 2009l; ICF and BonTerra 2010c); 2009 and 2010 southwestern pond turtle (*Emys marmorata*) focused surveys (AMEC 2009q; ICF and BonTerra 2010d); and 2009 and 2010 two-striped garter snake (*Thamnophis hammondi*) and south coast garter snake (*Thamnophis sirtalis* spp.) focused surveys (AMEC 2009r; ICF and BonTerra 2010e). The biological resources within the BSA were also evaluated during general biological preconstruction surveys and bat habitat assessment preconstruction surveys within the BSA (ICF 2010ak, 2010cb, 2010ce, 2010ez, 2010fr, 2011ad, 2011dj, 2011dk, 2011fi, 2011fo, 2011gi, 2011he, 2011gm, 2011gn, 2011gp, 2012f; FRED Survey Parent 000005). A literature review was also performed as part of the Biological Review for Segment 8 Phase 4 (West) (ICF 2010ar, 2010dw). Additionally, clearance sweeps were conducted within the BSA on June 1, 22, 2011; July 8, 2011; August 2, 22, 2011; and September 28, 2011. Construction monitoring has been ongoing regularly since the sites became active, and species events and nest events are recorded in the Field Reporting Environmental Database (FRED).

Site VR6 – Vegetation communities within the Variance Project Component include coastal sage scrub, disturbed/developed, and mixed chaparral. Vegetation communities within the 500-foot buffer include California annual grassland, California walnut woodland, coast live oak woodland, coast live oak woodland – burned, coastal sage scrub, disturbed/developed, mixed chaparral, and nonnative woodland. Special-status plant species California walnut, and regulated tree species, blue elderberry (*Sambucus cerulea*), coast live oak (*Quercus agrifolia*), toyon (*Heteromeles arbutifolia*), California scrub oak (*Quercus berberidifolia*), and holly-leaved cherry (*Prunus ilicifolia*), occur within the 500-foot buffer. Special-status wildlife observed within the 500-foot buffer includes an occupied burrowing owl burrow and San Diego desert woodrat potential middens. The Variance Project Component and 500-foot buffer are located within coastal California gnatcatcher designated critical habitat. Jurisdictional features 8-21-S-2 and 8-21-S-3 occur within the 500-foot buffer.

Site VR8 – Vegetation communities within the Variance Project Component include coast live oak woodland and disturbed/developed. Vegetation communities within the 500-foot buffer include California annual grassland, California walnut woodland, coast live oak woodland, coastal sage scrub, disturbed/developed, nonnative woodland, and ruderal grassland. Special-status plant species, California walnut, occurs within the Variance Project Component and 500-foot buffer. Regulated tree species, blue elderberry, California scrub oak, coast live oak, toyon, laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), and red gum (*Eucalyptus camaldulensis*) occur within the 500-foot buffer. Special-status wildlife observed within the 500-foot buffer includes Cooper's hawk and San Diego desert woodrat potential midden. The Variance Project Component and the 500-foot buffer are within coastal California gnatcatcher designated critical habitat.

Impacts associated with this FEC request includes approximately 0.031 acres of permanent impacts to coastal California gnatcatcher *designated critical* habitat. Permanent impacts to special-status vegetation communities and special-status species habitat will be mitigated off-site per agreements with CDFW and USFWS, and Applicant Proposed Mitigation (APM) BIO-7. Due to increases in permanent impacts to coastal California gnatcatcher *designated critical* habitat, an amendment to the Biological Opinion will be required. The Variance Project Components do not impact any additional coastal California gnatcatcher *occupied* habitat or least Bell's vireo occupied habitat.

Jurisdictional resources within the Variance Project Component were evaluated during the 2010 jurisdictional delineation for Segments 7 and 8 (ICF 2010h). Jurisdictional features mapped within the BSA will be avoided by the Variance Project Components. Any additional potential jurisdictional features will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance.

No additional impacts to biological resources are anticipated with the implementation of this Final Engineering Concurrence and the conditions noted below.

- **Cultural and Paleontological Resources:** SCE submitted a memorandum dated January 25, 2013 with the Variance Request titled the *TRTP Cultural and Paleontological Resources Guidelines for Segment 8 T/L Variance Request – Segment 8 T/L Phase IV and Phase I – Additional Work Areas and Access Roads*. The memorandum states that no previously recorded historical resources, historic properties, or significant paleontological resources will be impacted by the proposed wire setup sites and access road additions, in support of the TRTP. All of the proposed changes fall entirely within the cultural resources records searches for TRTP (Pacific Legacy 2007, 2010a, 2010b, Wetherbee 2011). The previous cultural resources inventory efforts show that no previously recorded cultural resources lie within the areas proposed in this Variance Request. All areas were investigated in previous cultural resources field surveys (Pacific Legacy 2007, 2010a, 2010b, Wetherbee 2011). Based on the negative results of the records searches and field surveys, no additional cultural resources assessments or monitoring are required to support this Variance Request.

Previous paleontological assessments for TRTP define three different soil types at the proposed locations (Gust and Scott 2009). These following described each sediment type, paleontological sensitivity level (based on the Potential Fossil Yield Classification (PFYC) system, and monitoring requirements:

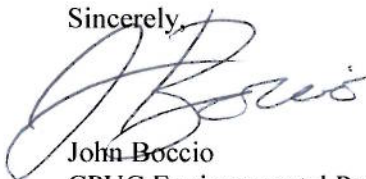
VR Area	Sediment Type	PFYC Level	Paleontological Monitoring Requirements
Site 6	Puente Formation	5	Full time monitoring during ground disturbance
Site 8	Puente Formation	5	Full time monitoring during ground disturbance

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Final Engineering Concurrence and the conditions noted below.

The conditions noted below shall be met by SCE and its contractors:

- Due to increases in permanent impacts to coastal California gnatcatcher *designated* critical habitat, an amendment to the Biological Opinion (BO) will be required. No work shall occur in the VR sites that are subject to the BO Amendment.
- Due to the high sensitivity for paleontological resources and per the requirements of the Paleontological Resources Management Plan, a paleontological monitor shall be present during ground disturbing activities at Sites 6 and 8.
- All conditions required by Notice to Proceed (NTP) NTP #24 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #24, and this Final Engineering Concurrence shall be available on site for the duration of construction activities where applicable.

Sincerely,



John Boccio
CPUC Environmental Project Manager